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CIVIL ACTION NO.: 2:19-cv-1046-MHT

INTO EVIDENCE

1. LAYOUT OF BRAVO DORM ONE AT THE TIME OF THE INCIDENT AND LOCATION OF THE INCIDENT AND WHERE THE OFFICERS WERE.
2. WRITINGS DERIVED FROM THE UNITED STATES DEPARTMENT OF JUSTICE CIVIL RIGHTS DIVISION INVESTIGATION (APRIL 2, 2019).
3. DECLARATION FROM PLAINTIFF SHOWING INCIDENTS THAT HAVE OCCURRED THIS YEAR THAT PLAINTIFF HAS PERSONAL KNOWLEDGE OF.
4. GRAPHIC ARTIST DRAWINGS CONSTITUTE "WRITINGS" WITHIN THE MEANING OF RULE 1001(1) THEY CONSIST OF "THEIR EQUIVALENT". SEILER V. LUCASFILM, Ltd, 484 U.S. 826, (1987).

RESPECTFULLY SUBMITTED,

6-15-20
DATED

Daniel Armendariz
PRINT NAME

Daniel Armendariz
SIGNATURE

AIS#313909
ELMORE CORRECTIONAL FACILITY
3520 MARION SPILLWAY ROAD
ELMORE, AL 36025

EXHIBIT

C

UNITED STATES DEPARTMENT OF JUSTICE

CIVIL RIGHTS DIVISION

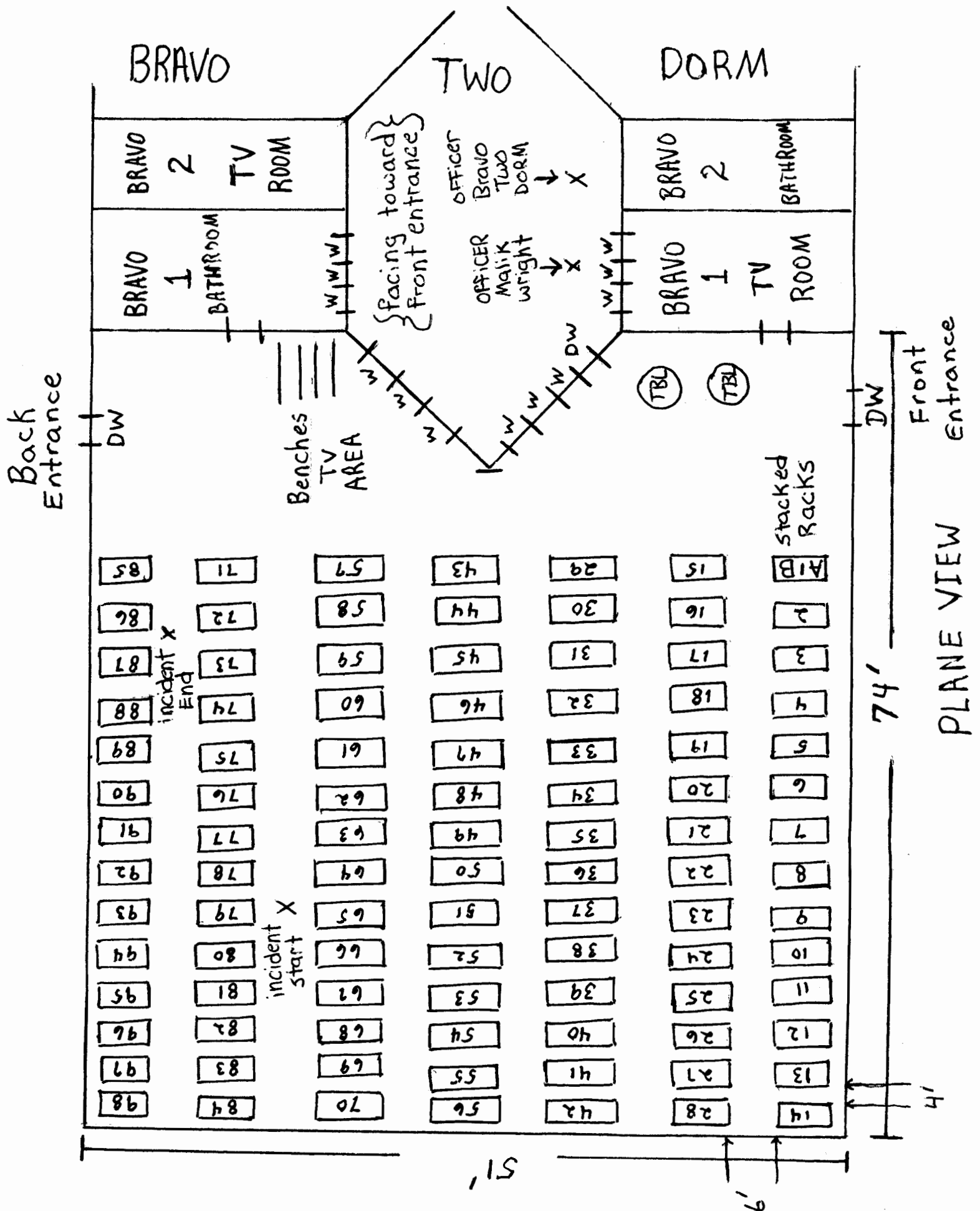
INVESTIGATION APRIL 2, 2019

1. IN FEBRUARY 2017, AN ELMORE PRISONER WAS KILLED BECAUSE OF A FAILED DRUG TRANSACTION. MULTIPLE PRISONERS ATTACKED THE VICTIM WHILE HE LAY ASLEEP IN BED, THEN HE WAS DRAGGED ON A BLANKET TO THE COMMON ROOM. WHERE A CORRECTIONAL OFFICER EVENTUALLY DISCOVERED HIM. HE WAS AIR LIFTED TO AN OUTSIDE HOSPITAL FOR EMERGENCY SURGERY DUE TO A BRAIN HEMORRHAGE HE DIED TWO DAYS LATER.

2. IN APRIL 2017, AT ELMORE A PRISONER INFORMED AN OFFICER IN AN OPEN DORMITORY THAT HE HAD JUST BEEN STABBED IN THE BACK. THE PRISONER WAS TAKEN BY AMBULANCE TO AN OUTSIDE HOSPITAL WHERE HE UNDER WENT EMERGENCY SURGERY FOR A PUNCTURED LUNG. THE WEAPON USED TO STAB THE VICTIM COULD NOT BE FOUND. (pg.20)

3. IN JULY 2017, AT ELMORE AN OFFICER OBSERVED A GATHERING OF PRISONERS AT THE BACK OF THE DORMITORY AND SAW THAT ONE PRISONER WAS BLEEDING FROM HIS CHEST. HE RADIOED FOR ASSISTANCE AND THE PRISONER WAS ESCORTED TO THE HEALTH CARE UNIT. THE PRISONER WAS TAKEN BY HELICOPTER TO AN OUTSIDE EMERGENCY ROOM. THE STABBING HAPPENED WHEN THE VICTIM TRIED TO INTERCEDE AND STOP A FIGHT BETWEEN TWO OTHER PRISONERS. (pg.19)

4. APRIL 2018 PRISONER AT ELMORE, AFTER HIS MOTHER CALLED TO REPORT THAT HE HAD BEEN RAPED.



CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 15 DAY OF June, 2020
CAUSED A TRUE AND CORRECT COPY OF THE FOREGOING TO BE SERVED
UPON THE DEFENDANTS BY PLACING THE SAME IN THE U.S. MAIL,
POSTAGE PREPAID AND ADDRESSED AS FOLLOWS:

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